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Cc: Cohen, Adam[Adam.Cohen@dgsllaw.com]
From: Cohen, Adam
Sent: Mon 1/15/2018 10:33:09 PM
Subject: Anaconda Copper Mine Site - Draft AOC
Anaconda Cost AOC 1-15-18.docx

Dusty – Thanks for providing the revised draft of the AOC last Friday. I have closely reviewed it, and the vast majority of the proposed changes are acceptable to ARC. The attached redline shows the following additional changes, only one of which is substantive:

¶ 13, definition of “Work” – I don’t think we need the exception for Record Retention requirements, since Work only refers back to the prior orders.

¶ 29 – ARC’s reservation should not be limited to contribution claims under § 113(f).

¶ 47 – There is an extraneous “and” in the first line.

If these additional revisions are acceptable to EPA, ARC is prepared to move forward with signing.

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